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UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

SEE ATTACHMENTS "EXHIBIT 1" AND
"EXHIBIT 2"

No. CR SEE ATTACHMENTS

GOVERNMENT'S EX PARTE APPLICATION
FOR ORDER SEALING MATTERS LISTED
IN EXHIBIT 1 AND UNSEALING MATTERS
LISTED IN EXHIBIT 2

(UNDER SEAL)

Plaintiff United States of America, by and through its counsel
of record, the Acting United States Attorney for the Central District
of California and Assistant United States Attorney MiRi Song, hereby
applies ex parte for an order (1) to seal the matters listed in
Exhibit 1, along with this ex parte application and proposed order,
and (2) to unseal the matters listed in Exhibit 2.

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1 This ex parte application is based upon the attached declaration
2 of MiRi Song.

3 Dated: March 11, 2025

Respectfully submitted,

4 JOSEPH T. MCNALLY
Acting United States Attorney

5 LINDSEY GREER DOTSON
6 Assistant United States Attorney
7 Chief, Criminal Division

8 /s/ MiRi Song

9 MIRI SONG
Assistant United States Attorney

10 Attorneys for Plaintiff
11 UNITED STATES OF AMERICA
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DECLARATION OF MIRI SONG

I, MiRi Song, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California, and I am one of the attorneys representing the government on multiple matters that are currently pending before this Court that charged violation(s) of 8 U.S.C. § 1326.

2. The government requests that the matters listed in Exhibit 1, along with this ex parte application and proposed order, be filed or remain under seal. The named defendants in these matters have not been taken into custody on the charge(s) contained in the complaints and have not been informed that they are being named as a defendant in a criminal matter.

3. If these matters were publicly available, that may result in defendants being notified and fleeing from prosecution and may also result in increased safety risks to the law enforcement officers, who are tasked with executing the outstanding arrest warrants for said defendants.

4. Accordingly, the government requests that the matters listed in Exhibit 1, along with this ex parte application and proposed order, be sealed and remain so until defendants are arrested and taken into custody on the charge(s) alleged in their respective criminal complaints.

5. The government submits that an individual matter should be unsealed at the earliest time practicable, specifically when the dangers mentioned in the preceding paragraph are dissipated. Thus, the government requests that matters listed in Exhibit 1 be unsealed at the time of defendants' arrest, rather than at the initial

1 appearances.

2 6. Lastly, the government requests that the matters listed in
3 Exhibit 2 be unsealed to the extent that they are sealed, as the
4 defendants in those matters have been arrested and/or made their
5 initial appearances already.

6 I declare under penalty of perjury under the laws of the United
7 States of America that the foregoing is true and correct and that
8 this declaration is executed at Los Angeles, California, on March 11,
9 2025.

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11 /s/ MiRi Song
MIRI SONG

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Acting United States Attorney
2 LINDSEY GREER DOTSON
Assistant United States Attorney
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9 Attorneys for Plaintiff
UNITED STATES OF AMERICA
10

11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 SEE ATTACHMENTS "EXHIBIT 1" AND
14 "EXHIBIT 2"

No. CR 25-

[PROPOSED] ORDER SEALING MATTERS
LISTED IN EXHIBIT 1 AND UNSEALING
MATTERS LISTED IN EXHIBIT 2

(UNDER SEAL)

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18 For good cause shown, IT IS HEREBY ORDERED THAT:

19 The government's ex parte application for an order sealing
20 matters listed in Exhibit 1 and unsealing matters in Exhibit 2 is
21 GRANTED. The matters listed in Exhibit 1, along with the
22 government's ex parte application, shall be sealed. Such matters
23 will automatically be unsealed at the moment of a defendant's arrest,
24 rather than at a later point, such as at the initial appearance.

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1 It is further ordered that the matters listed in Exhibit 2 be
2 unsealed, as the defendants in those matters have already been
3 arrested and/or made their initial appearances, thus obviating the
4 need to seal for dangers of flight from prosecution and dangers to
5 law enforcement officers tasked with executing any outstanding arrest
6 warrants.

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9 _____
DATE

THE HON. BRIANNA FULLER MIRCHEFF
UNITED STATES MAGISTRATE JUDGE

10 Presented by:

11 _____
/s/ MiRi Song

12 MIRI SONG
13 Assistant United States Attorney
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EXHIBIT 1

EXHIBIT 1

1. 2:24-MJ-6452
2. 2:25-CR-91-FMO
3. 2:25-CR-92-FMO
4. 2:25-CR-98-MWC
5. 2:25-MJ-52
6. 2:25-MJ-534
7. 2:25-MJ-675
8. 2:25-MJ-683
9. 2:25-MJ-695
10. 2:25-MJ-753
11. 2:25-MJ-757
12. 2:25-MJ-767
13. 2:25-MJ-773
14. 2:25-MJ-784
15. 2:25-MJ-813
16. 2:25-MJ-815
17. 2:25-MJ-816
18. 2:25-MJ-821
19. 2:25-MJ-831
20. 2:25-MJ-832
21. 2:25-MJ-835
22. 2:25-MJ-836
23. 2:25-MJ-846
24. 2:25-MJ-851
25. 2:25-MJ-857
26. 2:25-MJ-867
27. 2:25-MJ-869
28. 2:25-MJ-879

1	29.	2:25-MJ-880
2	30.	2:25-MJ-883
3	31.	2:25-MJ-889
4	32.	2:25-MJ-905
5	33.	2:25-MJ-954
6	34.	2:25-MJ-666
7	35.	2:25-MJ-758
8	36.	2:25-MJ-887
9	37.	2:25-MJ-870
10	38.	2:25-MJ-873
11	39.	2:25-MJ-878
12	40.	2:25-MJ-879
13	41.	2:25-MJ-884
14	42.	2:25-MJ-885
15	43.	2:25-MJ-886
16	44.	2:25-MJ-888
17	45.	2:25-MJ-890
18	46.	2:25-MJ-891
19	47.	2:25-MJ-894
20	48.	2:25-MJ-899
21	49.	2:25-MJ-903

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EXHIBIT 2

EXHIBIT 2

1. 2:25-MJ-00738

2. 2:25-MJ-00848

3. 2:25-CR-00097

4. 2:25-MJ-00528

5. 2:25-MJ-00573

6. 2:25-MJ-00651

7. 2:25-MJ-00680

8. 2:25-MJ-00682

9. 2:25-MJ-00690

10. 2:25-MJ-00720

11. 2:25-MJ-00730

12. 2:25-MJ-00765

13. 2:25-MJ-00771

14. 2:25-MJ-00781

15. 2:25-MJ-00828

16. 2:25-MJ-00847

17. 2:25-MJ-00850

18. 2:25-MJ-00872

19. 2:25-MJ-00875

20. 2:25-MJ-00897

21. 2:25-MJ-00900

22. 2:25-MJ-00901

23. 2:25-MJ-00929